

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

EDMUND AWAH,)	
)	
Plaintiff,)	
)	
vs.)	
)	CASE NO.:
TRANSUNION, EQUIFAX and)	
EXPERIAN)	
)	
Defendants.)	
_____)	

NOTICE OF REMOVAL

Defendant, Equifax Information Services LLC (“EIS”), incorrectly identified in the Amended Complaint as “Equifax”, files this Notice of Removal of this action from the Howard County District Court, wherein it is now pending as Case No. 1001 0000539 2015, to the United States District Court for the District of Maryland. This Notice of Removal is filed pursuant to 28 U.S.C. §§ 1441 and 1446. In support hereof, EIS submits the following:

1. Plaintiff filed this action on February 9, 2015 in the Howard County District Court, entitled *Awah v. Transunion, et al.*, Case No. 1001 0000539 2015 (the “State Court Action”).

2. Plaintiff served EIS with the original complaint on March 23, 2015.

3. On June 24, 2015, Plaintiff filed a Motion For Leave Of Court To Amend Complaint and attached a proposed Amended Complaint. (See Exhibit A hereto.) The Amended Complaint includes a new cause of action for violations of the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* (*Id.*, Amended Complaint, ¶¶ 10-21.)

4. Plaintiff served the Motion For Leave with the Amended Complaint on June 23, 2015.

5. This Notice is being filed with this Court within thirty (30) days after EIS was served with a copy of Plaintiff's Amended Complaint, which added claims under Federal law.

6. Upon information and belief, on or about July 13, 2015, the State Court Action was transferred from District Court for Howard County to the Circuit Court for Howard County (the "Circuit Court for Howard County Case"). However, the Circuit Court for Howard County Case does not have a case number yet.

7. This Court has original jurisdiction over this case pursuant to 28 U.S.C. § 1331, in that this is a civil action arising under the Constitution, laws or treaties of the United States; specifically 15 U.S.C. § 1681 *et seq.*, otherwise known as the Fair Credit Reporting Act ("FCRA"), as follows:

(a) Plaintiff's Amended Complaint alleges a violation of the FCRA. (See Amended Complaint, ¶¶ 10-21).

(b) The FCRA, pursuant to 15 U.S.C. § 1681(p), provides that any action alleging a violation of its provisions "may be brought in any appropriate United States district court without regard to the amount in controversy . . ."

8. Promptly after the filing of this Notice of Removal, EIS shall give written notice of the removal to Plaintiff and to the Clerk of the Howard County District Court, as required by 28 U.S.C. § 1446(d). After the Circuit Court for Howard County Case receives a case number, EIS shall also give written notice of the removal to Plaintiff and to the Clerk of the Howard County Circuit Court, as required by 28 U.S.C. § 1446(d).

9. Attached hereto, as Exhibit B, are copies of the Summons and the original Complaint served upon EIS in the State Court Action.

10. Experian Information Solutions, Inc. ("Experian") consents to the removal of this case. Attached hereto, as Exhibit C, is a copy of the Consent of codefendant Experian. Upon information and belief, the only other defendant, Trans Union LLC, has not been served in this action.

11. Attached hereto as Exhibit D are copies of all other pleadings in the State Court Action.

WHEREFORE, EIS requests that the above-described action be removed to this Court.

Respectfully submitted this 13th day of July, 2015.

/s/ Nathan D. Adler

Nathan D. Adler Bar No. 22645
NEUBERGER, QUINN, GIELEN, RUBIN &
GIBBER, P.A.
One South Street, 27th Floor
Baltimore, Maryland 21202-3201
Tel: (410) 332-8516

*Attorneys for Equifax Information Services
LLC*

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of July, 2015, I filed the foregoing with the Clerk of Court and served a copy by U.S. Mail to the following:

Edmund Awah
PO Box 1592
Laurel, MD 20725

Sandy David Baron
Shulman, Rogers, Gandal, Pordy & Ecker, P.A.
12505 Park Potomac Avenue, 6th Floor
Potomac, MD 20854

/s/ Nathan D. Adler

Nathan D. Adler